

## REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1, 3, 4, and 6 through 10 are pending, with Claims 1 and 10 being independent. Claims 1 and 10 have been amended.

Claims 1, 3, 4, and 6 through 10 were variously rejected under 35 U.S.C. § 103 over U.S. Patent Application Publication No. US 2002/0024602 A1 (Juen, et al.), “System on a Chip for a Digital Still Camera” (Okada, et al.), U.S. Patent No. 5,737,014 (Tojo, et al.), U.S. Patent No. 6,603,866 B1 (Motono), and U.S. Patent No. 5,262,871 (Wilder, et al.). All rejections are respectfully traversed.

Claim 1 recites, *inter alia*, that the memory interface is capable of generating addresses of a memory of larger capacity than the second memory, wherein the converting means, first memory for storing the moving image signal, memory interface, and still image processing means are provided on a single integrated circuit, and the image pickup means and second memory are built as a circuit *different* from the single integrated circuit (with use of a predetermined recording format as claimed).

Claim 10 recites, *inter alia*, that the memory interface is capable of generating addresses of a memory of larger capacity than the second memory, wherein the input unit,

conversion circuit, first memory for storing moving image signal, memory interface, and still image processing circuit are provided on a single integrated circuit, and the second memory is built as a circuit *different* from the single integrated circuit (with use of a predetermined recording format as claimed).

Applicant respectfully submits that none of Juen, Okada, et al., Tojo, et al., Motono, and Wilder, et al., even in the proposed combinations, assuming, *arguendo*, that such could be combined, discloses or suggests at least the above-discussed claimed features as recited, *inter alia*, in Claims 1 and 10.

The Official Action states that Okada, et al. teaches providing the first memory, a memory interface, conversion means, and still image processing means as a single integrated circuit. This statement is respectfully traversed. Applicant submits that, reviewing Okada, et al.'s Fig. 1, it is apparent that the SDRAM is provided separately from the ASIC. The Official Action relies on Tojo, et al.'s memory 7. This reliance is traversed. Tojo, et al. states that memory is limited and that it may be possible in the future to store several tens of frames or more (see col. 5, ll. 56-60), but does not disclose both still and moving image capture, as a result of which there is no teaching, motivation, or suggestion to combine Tojo, et al. with Juen.

It is further respectfully submitted that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features. Applicant submits that by means of said features, even if the number of pixels of a still image signal increases so that a memory having larger storage capacity is required as the second memory, the apparatus of the present invention

can still process the still image signal without changing the configuration of the single integrated circuit, since the memory interface is arranged so as to generate addresses of a memory of larger capacity than the second memory.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

This Amendment After Final Rejection is an earnest attempt to advance prosecution and reduce the number of issues, and is believed to clearly place this application in condition for allowance. Furthermore, Applicants respectfully submit that a full appreciation of these amendments will not require undue time or effort given the Examiner's familiarity with this application. Moreover, this Amendment was not earlier presented because Applicants earnestly believed that the prior Amendment placed the subject application in condition for allowance. Accordingly, entry of this Amendment under 37 C.F.R. § 1.116 is respectfully requested.

Applicant submits that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should to be directed to our below listed address.

Respectfully submitted,

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